

ATTACHMENT A

Remarks

By this Amendment, independent claims 1 and 8 have been amended to better define the invention. It is submitted that the present application is in condition for allowance for the following reasons.

Initially, it will be noted that a telephone interview was conducted with the examiner on November 21, 2003 to discuss the outstanding art rejection of claims 1 (and 8, as the same issue is present). This interview was most helpful, and the examiner's attention and participation during the interview is appreciated. As a result of the proposed changes and discussions, the examiner agreed that the proposed language seemed sufficient to differentiate over the applied art and presumably the art of record (subject to a more studied confirmation of this). The changes to the claims, and the discussions below, thus reflect the changes agreed to and the agreements reached during this interview.

In the outstanding Office Action, independent claims 1 and 8 were both rejected under 35 USC § 102 as being anticipated by either the Sakakibara patent or the Kodaverdian patent; while claims 2-7 dependent from claim 1 and claim 9 dependent from claim 8 were also rejected under 35 USC § 102 as being anticipated by either or both the Sakakibara patent or the Kodaverdian patent. As noted by the examiner in the action with respect to independent claims 1 and 8, both the Sakakibara patent and the Kodaverdian patent disclose a period between the actuation of a first actuator and a second actuator which is separated by "a predetermined length of time that depends on the initial conditions" [emphasis added] of the two actuators. Thus, as also noted by the

examiner, the time delay "varies" with very different initial condition - so there are an infinite number of such time delays.

However, as discussed during the interview, the present invention has a predetermined length of time which is set constant or fixed, and hence which does not vary according to initial conditions. Thus, it was agreed that the use of "fixed" and "which is irrelevant of initial conditions" to describe the claimed "predetermined length of time" would satisfactorily differentiate the present claims over the cited Sakakibara patent and Kodaverdian patent.

It was also argued briefly during the interview that the term "predetermined", by definition, would not mean to someone in the art that something is predetermined based only on the varying initial conditions thereof. The term "predetermined" means, by ordinary dictionary definitions: "set in advance", "to decide or arrange something at an earlier time", or "to determine or decide something in advance". Thus, those of ordinary skill would not consider something with variable time delays to be "predetermined". Rather, those of ordinary skill would consider the variable time delays of the Sakakibara patent and the Kodaverdian patent to be not predetermined but a function of chance. Further, the claims recited "a" time delay and not "a plurality of (variable) time delays" which would be the case in the Sakakibara patent and the Kodaverdian patent. Of course, such assertions are irrelevant in view of the noted changes which already differentiate over the art.

It was also asserted during the interview that the added language does not create any new issue. In the previous Amendment filed May 20, 2003, the term "fixed" was specifically proffered to the examiner as an addition to the independent claims to make

them allowable (see page 3, last sentence of the second full paragraph). In addition, the arguments in the previous Amendment were particularly directed to this difference between the present invention and the disclosures of the Sakakibara patent and the Kodaverdian patent. It is also noted that this proffered change to the claims was not responded to by the examiner in the present Office Action.

Further, in the previous Amendment, it was specifically argued that:

- 1) "the predetermined length of time does not depend on the working of the seat " (see page 2, lines 11-12); and
- 2) "the time delay does not depend on the positions of the movable seat parts" (see page 2, lines 12-13).

These two recitations are equivalent to the added recitation of a predetermined length of time "which is irrelevant of initial conditions", which was the language specifically suggested by the examiner, so that no new issue is presented by this phrase as well.

Therefore, for all of the foregoing reasons, it is submitted that presently amended independent claims 1 and 8 should be entered and that claims 1 and 8 are then allowable over the art of record. Further, as the other remaining claims are dependent from one of these independent claims, the dependent claims are likewise allowable.

For all of the foregoing reasons, it is submitted that the present application is in condition for allowance and such action is solicited.

ATTACHMENT B**Amendments to the Claims**

This listing of claims will replace all prior versions, and listings, of claims in the application.

1. (currently amended) A method for controlling the dynamics of a seat comprising at least three seat parts which can move with respect to one another, and at least two actuators for moving the three parts with respect to one another, the method comprising a step of operating the two actuators jointly to modify the configuration of the seat, said operating step comprising the following successive steps:

- activating a first actuator at a first instant; and
- activating a second actuator at a second instant subsequent to the first instant and separated from the first instant by a fixed predetermined length of time which is irrelevant of initial conditions.

2. (previously presented) The method as claimed in claim 1, further comprising a step of detecting that the first actuator has stopped during the predetermined length of time, and a step of activating the second actuator as soon as said step of detecting detects that the first actuator has stopped.

3. (previously presented) The method as claimed in claim 1, wherein said operating step is a step of bringing the seat into a predetermined configuration in which two of the moving parts are in predetermined positions specific to the predetermined configuration.

4. (previously presented) The method as claimed in claim 3, further comprising a step of detecting that the first actuator has stopped during the predetermined length of time and a step of activating the second actuator as soon as said step of detecting detects that the first actuator has stopped, and wherein the step of detecting that the first actuator has stopped comprises a step of detecting that the seat part operated by the first actuator has reached the predetermined position thereof.

5. (previously presented) The method as claimed in claim 3, in which the seat comprises a seat cushion, a leg rest articulated to the seat cushion between a folded-back position and a deployed position, a foot rest that can move with respect to the leg rest between a retracted position and a deployed position, and two actuators arranged, one of them between the seat cushion and the leg rest, and the other one, between the leg rest and the foot rest, in which method the phase of joint operation of the two activators is designed to move the leg rest into the deployed position thereof and the foot rest into the deployed position thereof, wherein the first actuator triggered at the first instant is the actuator arranged between the seat cushion and the leg rest, and the second actuator triggered at the second instant subsequent to the first instant is the actuator arranged between the leg rest and the foot rest.

6. (previously presented) The method as claimed in claim 3, in which the seat comprises a seat cushion, a leg rest articulated to the seat cushion between a folded-back position and a deployed position, a foot rest that can move with respect to the leg rest between a retracted position and a deployed position, and two actuators arranged, one of them between the seat cushion and the leg rest, and the other one, between the leg rest and the foot rest, in which method the phase of joint operation of the two activators is designed to move the leg rest into the folded-back position thereof and the foot rest into the retracted position thereof, wherein the first actuator triggered at the first instant is the actuator arranged between the leg rest and the foot rest, and the second actuator triggered at the second instant subsequent to the first instant is the actuator arranged between the seat cushion and the leg rest.

7. (previously presented) The method as claimed in claim 5, wherein the predetermined length of time separating the first and second instants is set to make sure that the foot rest does not strike the floor over which the seat is installed when the seat configuration is being modified.

8. (currently amended) A seat comprising at least three seat parts which can move with respect to one another, and at least two actuators for moving the three parts with respect to one another, and operating means for operating the two actuators jointly to modify the configuration of the seat, said operating means comprise:

- means for actuating a first actuator at a first instant; and
- means of actuating a second actuator at a second instant subsequent to the said first instant and separated from the first instant by a fixed predetermined length of time which is irrelevant of initial conditions.

9. (previously presented) The seat as claimed in claim 8, wherein said operating means comprise means of detecting that the first actuator has stopped during the predetermined length of time, and means of actuating the second actuator as soon as said means of detecting detects that the first actuator has stopped.